

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA,**

**v.**

**MICHAEL HILD**

**Defendant.**

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**No. 19 Cr. 602 (RA)**

**DECLARATION OF MICHAEL HILD**

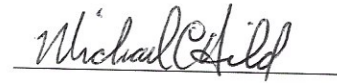
I, MICHAEL HILD, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

1. I recall Mr. Dusing told me that Allen Davis was unwilling to proceed as an expert witness in this case primarily because of a disagreement over money.
2. Mr. Dusing never communicated to me, that I recall, what Mr. Davis' expert fee would be despite my repeated asking of the amount he and Mr. Davis negotiated.
3. At no point that I recall did I tell Mr. Dusing that I was unwilling to pay Mr. Davis' fee or an expert fee of more than \$10,000.
4. Mr. Dusing received a substantial retainer to pay for fees and costs, including expert witness fees.
5. Mr. Dusing advised me before trial that I could expect to be on the witness stand for at least a week due to the numerous exhibits that he would introduce through my testimony.
6. I received the text message included as Attachment D to Mr. Dusing's affidavit only minutes before court began for the day and on the morning I began my testimony. Given that I was in court and trial was about to resume, I was not in a position to type a response.

Furthermore, Mr. Dusing did not cover the subjects we had previously agreed he would in my direct examination, including the role the SEC investigation played on the end of Live Well, and the history of me personally guaranteeing Live Well's debt without receiving any compensation.

7. Mr. Dusing told me in a phone call after my trial that Ms. Lawrence told him while they were both getting Covid tests before my trial that a hearing in his Kentucky Family Court litigation had been scheduled for May 4.

Executed on September 2, 2021, in Richmond, Virginia.

A handwritten signature in cursive script, appearing to read "Michael Hild", written over a horizontal line.

Michael Hild